

Nevada Bar No. 13075

Erik J. Foley, Esq.

Nevada Bar No. 14195

1 SNELL & WILMER L.L.P.

2 3883 Howard Hughes Pkwy., Ste. 1100

3 Las Vegas, Nevada 89169

4 Telephone: (702) 784-5200

5 Facsimile: (702) 784-5252

6 [vbohman@swlaw.com](mailto:vbohman@swlaw.com)

7 [efoley@swlaw.com](mailto:efoley@swlaw.com)

8  
9  
10  
*(additional counsel on signature page)*

11  
12  
13  
14  
15  
16  
17  
18  
19  
*Attorneys for Plaintiff*

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

20 TELIAX TECHNOLOGY LLC,

) Case No. 2:22-cv-00362-GMN-DJA

21 Plaintiff,

)

22 v.

)

23 AFFINITY NETWORK INC.,

) **UNOPPOSED MOTION AND**

24 Defendant.

) **[PROPOSED] ORDER EXTENDING**

) **DEFENDANT'S TIME TO FILE AN**

) **ANSWER OR OTHERWISE**

) **RESPOND TO PLAINTIFF'S**

) **COMPLAINT**

)

) **(FIRST REQUEST)**

)

20 Pursuant to LR IA 6-1 and 6-2, Plaintiff Teliax Technology LLC (“Teliax”), by and through

21 its counsel of record, files this Unopposed Motion to Extend Defendant Affinity Network Inc.’s  
22 (“ANI”) Time to File an Answer or Otherwise Respond to Plaintiff’s Complaint. This is the first  
23 request to extend this deadline.

24 Teliax filed the Complaint on February 28, 2022. (Doc. No. 1). Teliax served the Complaint  
25 and Summons on ANI on March 3, 2022. (Doc. No. 7). The current deadline for ANI to answer  
26 or otherwise respond to the Complaint is March 24, 2022.

The parties believe the litigation of this matter will be best served by extending the deadline for ANI to answer or otherwise respond to the Complaint by forty-six (46) days so that the parties can explore an amicable resolution of this matter.

Thus, for the reasons set forth above, Teliax respectfully requests that this Court grant its request to continue the deadline for ANI to answer or otherwise respond to the Complaint by forty-six (46) days up to and including May 9, 2022.

## IT IS SO ORDERED:

DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: March 28, 2022

DATED: March 24, 2022

Respectfully submitted,

SNELL & WILMER L.L.P.

**SNELL & WILMER**  
L.L.P.  
LAW OFFICES  
3883 HOWARD HUGHES PARKWAY, SUITE 111  
LAS VEGAS, NEVADA 89169  
702.784.5200

/s/ V.R. Bohman

V.R. Bohman, Esq. (Nevada Bar  
File No. E-1, State Bar No. 1, Reg.

3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89169

**OF COUNSEL:**

Jeffrey D. Blake (*Pro Hac Vice Forthcoming*)  
MERCHANT & GOULD P.C.  
191 Peachtree Street N.E., Suite 3800  
Atlanta, GA 30303  
Telephone: (404) 954-5040  
Email: [JBlake@MerchantGould.com](mailto:JBlake@MerchantGould.com)

James W. Beard (*Admitted Pro Hac Vice*)  
MERCHANT & GOULD P.C.  
1801 California Street, Suite 3300  
Denver, CO 80202  
Telephone: (303) 357-1189  
Facsimile: (612) 332-9081  
Email: [JBeard@MerchantGould.com](mailto:JBeard@MerchantGould.com)

*Attorneys for Plaintiff*

1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that on March 24, 2022 I electronically transmitted the foregoing document  
3 to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic  
4 Filing to all counsel in this matter; all counsel being registered to receive Electronic Filing.

5  
6                   */s/ D'Andrea Dunn*  
7                   An employee of SNELL & WILMER L.L.P.  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

SNELL & WILMER  
L.L.P.  
LAW OFFICES  
3883 HOWARD HUGHES PARKWAY, SUITE 1100  
LAS VEGAS, NEVADA 89169  
702.784.5200